MAY 05 1983

Mr. J. G. Brown Corporate Vice President McDonnell Douglas Corporation P.O. Box 516 St. Louis, Missouri 63166

EPA I.D. NO.: MODO00818963 St. Louis, Missouri

Dear Mr. Brown:

Thank you for your letter and documentation which was submitted to the Regional Administrator, Environmental Protection Agency (EPA), Region VII, to demonstrate compliance with the EPA regulations (40 CFR Part 265, Subpart H, Sections 143-151) in the areas of financial assurance for closure and post-closure, and liability insurance for your facility located in Missouri.

We have reviewed your submittal for compliance with the above referenced regulation and have listed below the deficiencies for your consideration and correction as noted.

Your financial letter of March 28, 1983, for the St. Louis, Missouri facility did not meet the requirements for satisfying the financial test mechanism. Subpart 265.143(e)(3) of the April 7, 1982, Federal Register, pages 15067/ 15068, specifies the owner/operator must submit to the Regional Administrator the following documents: (1) A letter signed by the owner or operator's Chief Financial Officer and worded as specified in \$264.151(f), page 15062/15063, (2) A copy of the independent certified public accountant's report on examination of financial statements for the latest completed fiscal year, and (3) A special report from the owner's/operator's independent certified public accountant stating he compared and verified the data in the chief financial officer's letter, and no matters came to his attention to cause the specified data to be adjusted. Item number 3, CPA's Special Report, was missing in your submittal to satisfy the financial requirements. Please provide a special report from your independent certified public accountant containing the information covered in the April 7, 1982, Federal Register on page 15068, to the FPA Regional Office, Permits Section, within 30 days of receipt of this letter.



RCRA RECORDS CENTER

	ARWM/WMBI	C PMTS:MPCTT	Y-WIIIIams	CONCURREN	1-5-3-83:Dis	N. U.		JE-A SE
SYMBOL	PMTS	, PMTS	WMBR	M	1000			
SURNAME	Perry-Wins	Harringt	on Morby				delication for	
DATE	Mass	5/4/83	Mosima					
EPA Form	1320-1 (12-70)	1	3/6/9	Sy -			OFFICI	AL FILE COPY

Thank you for your cooperation in supplying the additional information to expedite the review of your compliance with the financial assurance requirements as owner/operator of a hazardous waste management facility.

If you have further questions, please contact Michele Perry-Williams of my staff at (816) 374-6531.

Sincerely yours,

Robert L. Morby Chief, Waste Management Branch Air and Waste Management Division

Enclosure

cc: Dr. David Bedan

Missouri Department of Natural Resources

bcc: Michael Sanderson, AWCM







UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII 324 EAST ELEVENTH STREET KANSAS CITY, MISSOUR! - 64106

MAY 05 1983

Mr. J. G. Brown Corporate Vice President McDonnell Douglas Corporation P.O. Box 516 St. Louis, Missouri 63166 EPA I.D. NO.: MOD000818963 St. Louis, Missouri

Dear Mr. Brown:

Thank you for your letter and documentation which was submitted to the Regional Administrator, Environmental Protection Agency (EPA), Region VII, to demonstrate compliance with the EPA regulations (40 CFR Part 265, Subpart H, Sections 143-151) in the areas of financial assurance for closure and post-closure, and liability insurance for your facility located in Missouri.

We have reviewed your submittal for compliance with the above referenced regulation and have listed below the deficiencies for your consideration and correction as noted.

Your financial letter of March 28, 1983, for the St. Louis, Missouri facility did not meet the requirements for satisfying the financial test mechanism. Subpart 265.143(e)(3) of the April 7, 1982, Federal Register, pages 15067/ 15068, specifies the owner/operator must submit to the Regional Administrator the following documents: (1) A letter signed by the owner or operator's Chief Financial Officer and worded as specified in §264.151(f), page 15062/15063, (2) A copy of the independent certified public accountant's report on examination of financial statements for the latest completed fiscal year, and (3) A special report from the owner's/operator's independent certified public accountant stating he compared and verified the data in the chief financial officer's letter, and no matters came to his attention to cause the specified data to be adjusted. Item number 3, CPA's Special Report, was missing in your submittal to satisfy the financial requirements. Please provide a special report from your independent certified public accountant containing the information covered in the April 7, 1982, Federal Register on page 15068, to the EPA Regional Office, Permits Section, within 30 days of receipt of this letter.

Thank you for your cooperation in supplying the additional information to expedite the review of your compliance with the financial assurance requirements as owner/operator of a hazardous waste management facility.

If you have further questions, please contact Michele Perry-Williams of my staff at (816) 374-6531.

Sincerely yours,

Robert L. Morby

Chief, Waste Management Branch Air and Waste Management Division

Enclosure

cc: Dr. David Bedan

Missouri Department of Natural Resources